



U.S. Department of Justice

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December 15, 2016

The Honorable James K. Bredar
United States District Judge
101 West Lombard Street
Baltimore, MD 21201

Re: United States v. Gerald Johnson et al.,
Criminal No. JKB-16-0363

Dear Judge Bredar:

I write to advise the Court as to the status of the above-referenced case. As the Court is aware, on November 9, 2016, a grand jury in this district returned a superseding indictment charging nine defendants with conspiring to participate in a racketeering enterprise and other offenses. ECF No. 40. As of this writing, eight of the nine defendants are in custody. The remaining defendant, Marquise McCants, a/k/a "Digga," is a fugitive. He is actively being sought by law enforcement.

By mid-day tomorrow, all eight of the defendants in custody will have had their initial appearances and arraignments. Accordingly, from the government's point of view, this case will be ready for scheduling as early as tomorrow afternoon.

With regard to discovery, the government has executed discovery agreements with most, but not all, of the attorneys for the defendants in this case. We expect that the remaining discovery agreements will be signed by early next week, at the latest. After the agreements are signed, the government will make the first of a series of rolling discovery productions.

Please let us know if you have any questions, or if you need additional information.

Very truly yours,

Rod J. Rosenstein
United States Attorney

By: /s/
Peter J. Martinez
Christina A. Hoffman
Assistant United States Attorneys

cc: All Counsel of Record (via ECF)